

# Robert W. Seiden

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**VIA ECF**

Hon. Victor Marrero  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

September 26, 2022

**Re: *Baliga v. Link Motion Inc. et al., 1:18-cv-11642 (S.D.N.Y.)***

Dear Judge Marrero,

I write pursuant to your August 25, 2022 Order (ECF 331) which required the parties to submit a “proposed schedule for conducting an accounting over the receivership.” *See* ECF 331 at 23. After meeting and conferring with counsel for the parties, no agreement was reached on the schedule for the accounting. Therefore, the Receiver respectfully submits its proposed schedule for the accounting, as follows:

- (1) On or before December 16, 2022, the Receiver will file with the Court an accounting of the receivership, together with supporting documentation (the “Accounting”);
- (2) On or before January 13, 2023, the parties may serve on the Receiver requests to supplement the Accounting with any additional documentation. If no party requests such additional documentation from the Receiver, then the parties will file a joint letter on or before January 20, 2023, advising the Court that the Accounting is complete.
- (3) If any party requests supplemental documentation, then:
  - (a) the Receiver will endeavor to produce such additional documentation, to the extent it is readily accessible to the Receiver, by February 10, 2023. The parties and the Receiver agree to negotiate in good faith to resolve any disputes over such additional requested documentation;
  - (b) On or before February 28, 2023, the parties and the Receiver will (i) file a joint letter informing the Court that the Accounting is complete, or (ii) file objections to the Accounting, not to exceed three pages. The Accounting will be complete once the parties file the joint letter, or on the date on which the Court has made a final determination in regard to any objections to the Accounting.

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Court-Appointed Temporary Receiver for Link Motion  
Inc. Pursuant to The Honorable Judge Victor Marrero of  
the United States District Court, Southern District of New  
York

Given the fact that the Receiver's office needs to generate an accounting for a multi-year complex receivership that covered several jurisdictions, the Receiver believes the above-proposed schedule is reasonable and respectfully requests the Court to adopt it.

Respectfully Submitted,



Robert W. Seiden, Esq.  
Court-Appointed Temporary Receiver for  
Link Motion Inc.